

15 October 2021



Federal Communications Commission
45 L Street NE
Washington, DC 20554

TrickleStar Inc [EIN 81-5302681]
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**RE: FCC PROPOSAL TO REVISE RULES TO PROVIDE EXPANDED
OPERATIONAL FLEXIBILITY TO UNLICENSED FIELD DISTURBANCE
SENSOR (FDS) DEVICES THAT OPERATE IN THE 57-64 GHZ BAND (60 GHZ BAND).
AMENDMENT OF SECTION 15.255 OF THE COMMISSION'S RULES, ET DOCKET NO. 21-264**

TrickleStar manufactures affordable, simple, and easy-to-use products, which help everyday people reduce energy consumption in their homes and workplaces. TrickleStar leads in the design and manufacture of products that conserve energy, improve people's lives, and minimize environmental impact.

TrickleStar plans to launch an innovative energy saving computer keyboard in the United States that utilizes 60 GHz pulse radar, and therefore has a strong interest in the FCC adopting rules that support these radar operations. The primary purpose of the radar in the product is to quickly and accurately detect human absence and put the connected electronics equipment to sleep thereby saving power and securing computing devices from unauthorized access by other parties. The product will provide substantial energy savings for US consumers, organizations and federal agencies. It will help improve overall computing and networking security. **TrickleStar supports the proposals for new rules made by Acconeer in its comments filed in the proceeding (ET Docket No. 21-264).**

TrickleStar respectfully proposes that it is important for the FCC to promote advances in new radar technologies by adopting rules that are flexible, consistent with the ETSI standards, and technology neutral. These new rules will provide manufacturers with greater certainty in developing innovative radar technologies in a cost-effective manner.

As a result of TrickleStar's planned use of pulse radar technology, TrickleStar respectfully requests that the FCC ensures that all radar technologies in the above spectrum are treated equally when considering the impact of proposed technical rules on their specific operations. TrickleStar requests that the FCC remains technology agnostic and does not provide a market advantage to a single technology or vendor by adopting rules that have varying consequences on different radar technologies. TrickleStar contends this would disincentivize innovation and harm consumers. If FCC rules are not aligned with ETSI standards and are not supportive of pulsed radar, it will adversely impact TrickleStar's plans for US market availability with possible modifications, delays and cost increases required. This would deprive US organizations and consumers of an innovative energy saving technology that can be deployed widely across the US economy and play a small but important part in overall carbon reduction efforts.

TrickleStar is a public company with offices in the Grand Rapids, Michigan. TrickleStar has sold millions of energy saving products across the USA for more than a decade into ratepayer funded energy efficiency programs. For more information on TrickleStar, please see: www.tricklestar.com

TrickleStar thanks the FCC for consideration of our comments.

Bernard Emby
CEO
TrickleStar Inc.